

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA v.

HYTERA COMMUNICATIONS  
CORPORATION, LTD.

No. 20 CR 688-1

Judge John J. Tharp Jr.

**PROPOSED STATEMENT OF THE CASE**

The Defendant, Hytera Communications Corporation, Ltd., is a telecommunications company. The government alleges that Hytera took trade secret information belonging to Motorola, a competing telecommunications company. Hytera denies that it took anything from Motorola, and denies that the information at issue is a trade secret.

Hytera is charged with 21 counts related to the alleged theft of trade secrets from Motorola. Count One charges a conspiracy to steal, copy, and possess Motorola's trade secret information. Counts Two through Twenty-One charge Hytera with unlawfully possessing or attempting to possess trade secret information.

Hytera has pleaded not guilty to each of the counts in the indictment.

Dated: December 9, 2024

Respectfully submitted,

/s/ James L. Brochin

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